

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

COMMON CAUSE GEORGIA, as an
organization,

Plaintiff,

v.

BRIAN KEMP, in his official capacity as
Secretary of State of Georgia

Defendant.

Case No. 18-cv-05102-AT

DECLARATION OF LOGAN LAMB

I, Logan Lamb, declare as follows under penalty of perjury:

1. I am a cybersecurity researcher based in Atlanta, Georgia. I have a Bachelor of Science degree and a Master of Science in computer engineering from University of Tennessee, Knoxville. I have worked professionally in cybersecurity since 2010 where I started at Oak Ridge National Lab in the Cyber and Information Security Research group. In that position, I specialized in static and symbolic analysis of binaries, red-teaming prototype

critical infrastructure, and de-identifying geospatial data. I left that operation in 2014 and joined Bastille Networks, a local cyber-security startup business where I am still employed. At Bastille Networks I specialize in wireless security and applications of software defined radio. A true and correct copy of my professional credentials, is attached hereto as Exhibit A.

2. In 2016 and 2017 I was able to access publicly available files on elections.kennesaw.edu. One of these easily acquired files was PollData.db3, a voter registration database for the state of Georgia which was intended to be placed on electronic pollbooks. For each of the approximately 6.3 million voters in this database, there were records including:
 - a. Full name
 - b. Address
 - c. Birthday
 - d. Driver License Number
3. With these fields, an attacker can log into My Voter Page and change registration information for voters in an automated fashion, without requiring any software vulnerabilities. Since an attacker is able to change voter registration exactly as a voter would, it would be very difficult to differentiate between a legitimate changing of voter registration and a malicious attack. This systemic vulnerability, using publicly available information and a single non-public field (driver license number) to authenticate voters, means that My Voter Page is vulnerable to attack regardless of whether it has software vulnerabilities affecting it.

4. Since the purpose of the My Voter Page is to allow voters to view and change their information, I am forced to conclude that changes made on My Voter Page are later reflected in the statewide voter registration system, ElectionNet.

My name is Logan Lamb, my date of birth is March 16, 1988; my office address is 1000 Marietta Street, Suite 224, Atlanta GA; and I declare under penalty of perjury that the foregoing is true and correct.

Executed in Atlanta, Georgia on the 9th day of November 2018.

A handwritten signature in black ink, appearing to read 'Logan Lamb', written over a horizontal line.

LOGAN LAMB